

FILED _____ ENTERED _____
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**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF MARYLAND
 (Northern Division)**

3:44 pm, Nov 20 2023

AT BALTIMORE
 CLERK, U.S. DISTRICT COURT
 DISTRICT OF MARYLAND
 BY _____ Deputy

UNITED STATES OF AMERICA)	
v.)	CRIM. NO. ELH-21-036
JACKY LYNN MCCOMBER,)	
formerly known as)	
Jacky Lynn Kimmel,)	
Defendant.)	

THE GOVERNMENT'S SENTENCING HEARING EXHIBIT LIST

EXHIBIT NUMBER	DESCRIPTION	WITNESS	ADMITTED
1	Letter from Cherril A. Guinther (NSA) to Kristen Amos (ITK), dated December 19, 2011	Guinther	11/16/23
2	Contract Modification # 2 on the Ironbridge I contract (signed by Contracting Officer [CO] Cherril Guinther on December 13, 2011)	Guinther	11/16/23
3	Signature Pages for Ironbridge I Contract Modifications # 1 (9/12/2011), # 4 (2/28/2012), with accompanying letter from Jacky Kimmel), # 6 (7/12/12), # 7 (8/16/2012), and # 8 (11/1/2012) [taken from ITK Ironbridge contract file]	Guinther	11/16/23
4(a)	Letter purportedly from Cherril A. Guinther (NSA) to Craig Plunkett (ITK), dated October 10, 2012 (black and white copy)	Guinther/Plunkett	11/16/23
4(b)	Letter purportedly from Cherril A. Guinther (NSA) to Craig Plunkett (ITK), dated October 10, 2012 (color photograph)	Guinther/Plunkett	11/16/23

5	Letter purportedly from Cherril A. Guinther (NSA) to Craig Plunkett (ITK), dated October 10, 2012, marked with circles, arrows, and explanatory notes to flag anomalies identified by Cherril Guinther to government investigators	Guinther	11/16/23
6(a)	Facsimile cover sheet purportedly from Megan Collins (NSA) to Craig Plunkett (ITK), dated October 10, 2012 (black and white copy)	Guinther/Plunkett	11/16/23
6(b)	Facsimile cover sheet purportedly from Megan Collins (NSA) to Craig Plunkett (ITK), dated October 10, 2012 (color photograph)	Guinther/Plunkett	11/16/23
7	Facsimile cover sheet purportedly transmitted from Megan Collins (NSA) to Craig Plunkett (ITK), dated October 10, 2012, marked with circles, arrows, and explanatory notes to flag anomalies identified by Cherril Guinther to government investigators	Guinther	11/16/23
8	Additional copy of purported Guinther letter dated October 10, 2012 subsequently produced by defense counsel, purportedly from a different file (Item 12 for purposes of FBI Questioned Documents Examination)	Eisenhardt	11/16/23
9	Other letters and emails known to be authentic exchanged between ITK and the NSA between July 23, 2012 and November 7, 2012	Guinther/Plunkett/ Eisenhardt	11/16/23

10	Excerpt of NSA investigative interview transcript with Craig Plunkett dated March 8, 2018, in which he testified that there was never a written agreement from the NSA allowing ITK's program manager on the Ironbridge contract to work off-site, but only a "gentleman's agreement" to that effect	Plunkett	
11	C.V. of FBI Questioned Documents Examiner Linda Eisenhardt	Eisenhardt	11/16/23
12	Images of various awards received by Examiner Linda Eisenhardt (two from the FBI, including the Director's Award for Outstanding Scientific Achievement, and one joint award from the Forensic Research Committee of The American Society of Crime Laboratory Directors (ASCLD))	Eisenhardt	11/16/23
13	Documents submitted to the FBI Questioned Documents Unit (QDU) by government investigators in connection with its examination of the purported Guinther letter and facsimile cover sheet	Eisenhardt	11/16/23
14	Laboratory report prepared by FBI Questioned Documents Examiner Linda Eisenhardt concerning the questioned Guinther documents (dated July 19, 2022)	Eisenhardt	11/16/23
15	Slides prepared by FBI Questioned Documents Examiner Linda Eisenhardt summarizing her conclusions with respect to her examination of the questioned Guinther	Eisenhardt	11/16/23

ADMITTED

	documents		
16			
17	Email re Cherril Guinther access control records for 12/19/2011 & 10/10/2012		11/16/23
18	Email re access control records for Jacky Kimmel on 3/14/16		
19	Excerpts from Government cross of NSA Ironbridge Contracting Specialist and Contracting Officer (2016-18) Tiffany Starr Smith		11/20/23

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Respectfully submitted,

EREK L. BARRON
UNITED STATES ATTORNEY

/s/

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Date: November ____, 2023